

January 1 2017

Christine Littleton  
U.S. EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Dear Christine Littleton,

We are writing in regards to the Navy's Environmental Impact statement proposing an increase in EA-18G "Growler" Airfield Operations at NAS Whidbey Island Complex, and request that the EPA fundamentally revise the DEIS due to the deficiencies noted below.

Here are some of the key points we're challenging:

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**The Navy's calculation of Growler flyover decibels**

Section 3.2.2.1 of the EIS states that "DNL values are average quantities....The DNL metric quantifies the total sound energy received and is therefore a cumulative measure, but it does not provide specific information on the number of noise events or the individual sound levels that occur during the 24-hour day." We believe the Navy has downplayed the noise impact of actual flights over our homes and land, as it does not realistically predict actual peak noise impacts. Also, Marrowstone Island was not considered in the Navy's EIS, despite the fact that residents already hear Growlers regularly. Navy statistics say Growlers produce 113 db at an altitude of 1000 feet, well above the 85 db threshold for permanent hearing loss. Growlers can fly at 1200 feet above ground level in some areas of the Olympic Peninsula.

**Decreased property values were not realistically addressed**

While the EIS acknowledges in Section 4.10.2.1 that property values decrease with increasing aircraft noise, it uses estimates that are very general in nature and does not address any specific mitigation for such loss of value. In addition, and specifically with respect to Marrowstone Island, the EIS does not address the particular demographic of East Jefferson County, which has a very high percentage of retired persons. One of the main benefits of the properties on Marrowstone Island is the relative quiet afforded by this environment, which compensates for remoteness and similar factors. Hence, noise impacts from increased Navy aircraft would have a disproportionate effect on our residences, reducing property values much more substantially than estimated in the EIS and potentially causing severe financial hardship for residents that must sell because of age or infirmity.

**Increase in air emissions**

The EIS concludes that implementation of the proposed action will result in significantly increased levels of carbon dioxide, sulfur dioxide, VOCs, carbon monoxide, nitrogen dioxide, and particulate matter. However, there are no measures to offset this increased pollution.

### **Hearing Loss for citizens is not an acceptable outcome**

Even using their measurements, the Navy states that an increase of between 2572-5592 residents potentially risk hearing loss, directly due to aircraft noise exposure in all 3 alternatives. Refer to Table 4.2-25 DNL Noise Contour Comparison - Overall Increase in the Number of People within the 65 dB DNL Noise Contour.

This is not an acceptable impact to people's health.

### **Not enough research on effects on Bird Migrations**

The DEIS concludes that migrating and wintering waterfowl have 'presumably habituated' to high levels of aircraft operations, and thus would not be disturbed by an increase in aircraft operations. This is not based on fact or relevant studies.

From the DEIS "Migrating and wintering waterfowl are already exposed to an annual average of 89,000 aircraft operations (year 2021 flight operations; see Table 3.1-1)....Therefore, migrating and wintering waterfowl in the study area have presumably habituated to high levels of aircraft operations and other human-made disturbances. It is not expected that the Proposed Action would have significant impacts on waterfowl using the study area outside of the breeding season."

### **Not enough research on effects for the Marbled Murrelets and Whales**

"The Proposed Action's aircraft operations have the potential to cause noise and/or visual disturbances of marbled murrelets. (pages 4-209)

Much of the EIS states there is not sufficient research to know if the Marbled Murrelets will be affected.

Research must be done to ensure that the Marbled Murrelets will not be affected.

There needs to be an agreement that the Navy will not conduct Growler training during breeding season for birds.

In Section 4.8.3, the DEIS states that "The Navy will be consulting the USFWS on the Proposed Action's effects on Marbled Murrelets." Similarly in this section "The Navy will consult the NMFS regarding the effects determination for Southern Resident killer whales and humpback whales under the EIS." However, the DEIS does not present a schedule for such consultation, a discussion of the planned studies that would be performed to assess potential impacts to these biota, or any potential modifications to the proposed action that would be implemented to mitigate adverse effects. Such information must be provided in the DEIS to ensure that an environmentally responsible path forward is established prior to beginning any actions.

**Tourism economy was not addressed.**

A National Park Service report issued in July 2014 showed that in 2013, the 3,085,340 visitors to Olympic National Park spent \$245,894,100. Many residents depend on the natural beauty and serenity of the Olympic Peninsula for our livelihood. We are concerned the dramatic increase in Growler activity training program will decrease tourism. This needs to be addressed in the DEIS.

**Unacceptable levels of sound over Ebey State Park**

"With implementation of the Proposed Action, between approximately 33 percent and 43 percent of the 17,000-acre Ebey's Landing National Historical Reserve would be within the greater than 65 dB DNL contours, depending on the alternative selected."

**There is no real Action Alternative in the DEIS.**

All the scenarios in the EIS assume an increase in Growler training. The EIS presents no real alternative of 'no harm' for citizens. Although extensive discussion of alternatives not considered further is presented in Section 2.4, the arguments essentially reduce the undesirability of increased costs. No compelling technical reasons were presented against establishing a new Growler facility in another location where impacts on the population would not be nearly as detrimental. The three alternatives carried forward are relatively minor variations on the same action, all with similar adverse environmental consequences. The DEIS, therefore, is deficient at the most basic level in not including adequate assessment of genuine alternatives to reduce environmental impact.

For example, in the EIS section "Proposed Action": "Alternatives presented earlier in the scoping process analyzing fewer additional aircraft than 35 were not carried forward because Congress has authorized the purchase of more aircraft than were reflected in those earlier alternatives. Growler operations will increase under all alternatives analyzed in this Draft EIS. This increase will result in a total number of annual operations at the NAS Whidbey Island complex that is similar to the number of operations seen in the mid-1990s." This argument is circular and does not address alternatives in a present day context.

The EIS should be fundamentally revised to address the deficiencies noted above.

Thank you for considering these comments in your decisions.

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